

# ***EXHIBIT 26***

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNION DEL PUEBLO ENTERO,	)	
et al.,	)	
	)	
Plaintiffs,	)	Civil Action
	)	No. SA-21-CV-00844-XR
vs.	)	
	)	
GREGORY W. ABBOTT, et al.,	)	
	)	
Defendants.	)	
	)	

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ORAL DEPOSITION OF

ALAN VERA

FEBRUARY 27, 2023

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ORAL DEPOSITION OF ALAN VERA, produced as a witness at the instance of the Plaintiffs, and duly sworn, was taken in the above-styled and numbered cause on February 27, 2023, from 10:00 a.m. to 3:37 p.m., Nilda Codina, Notary in and for the State of Texas, recorded by machine shorthand, from Javier N. Maldonado & Associates, P.C., 1415 North Loop W., Suite 600, Houston, Texas, County of Harris pursuant to the Federal Rules of Civil Procedure, and the provisions stated on the record or attached hereto.

1 1 says can even inspect the ballot. That's not true  
2 when the voter's being assisted by their own chosen  
3 assistant.

4 Q. So how -- you know if a watcher asks you how  
5 close can I be in order to perform that function and  
6 you say being right there, how close is right there in  
7 a numerical sense?

8 A. We are still referring to a voter being  
9 assisted by an election worker, I've told the poll  
10 watchers they can be right there at the polling booth  
11 to be able to see every action made by the election  
12 worker and hear every instruction given by the voter to  
13 the election worker, close enough to see and hear.

14 Q. Okay. And how far is that in terms of  
15 distance?

16 A. It depends how good the poll watchers vision  
17 and hearing is.

18 Q. Okay. So let's say it's not great, but the  
19 poll watcher still capable of seeing and hearing, if  
20 the poll watcher says can I stand one foot from the  
21 voter, would you say that's okay?

22 A. I would tell the vote poll watcher if you  
23 need to stand one foot from the voter to see and hear  
24 everything, yes. Do not make contact with the voter or  
25 the election worker.

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REPORTER'S CERTIFICATE  
DEPOSITION OF ALAN VERA  
FEBRUARY 27, 2023

I, Nilda Codina, Notary in and for the State  
of Texas, hereby certify to the following:

That the witness, ALAN VERA, was duly sworn  
by the officer and that the transcript of the oral  
deposition is a true record of the testimony given by  
the witness;

I further certify that pursuant to FRCP Rule  
30(f)(1) that the signature of the deponent:

\_\_\_\_\_ was requested by the deponent or a  
party before the completion of the deposition and  
returned within 30 days from date of receipt of the  
transcript. If returned, the attached Changes and  
Signature Page contains any changes and the reasons  
therefor;

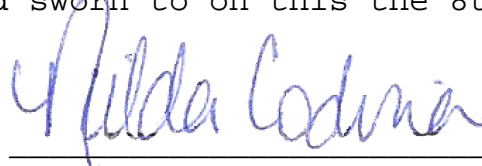
\_\_\_X\_\_\_ was not requested by the deponent or a

1 party before the completion of the deposition.

2 I further certify that I am neither attorney  
3 nor counsel for, related to, nor employed by any of the  
4 parties to the action in which this testimony was  
5 taken.

6 Further, I am not a relative or employee of  
7 any attorney of record in this cause, nor do I have a  
8 financial interest in the action.

9 Subscribed and sworn to on this the 8th day  
10 of March, 2023.



11  
12 NILDA CODINA  
Notary Public in and  
For the State of Texas  
13 My Commission No. 12878135-3  
Expires: 10/24/2023

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